

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA :

v. :

Criminal Action No. 05-105-JJF

ERNEST WILSON, :

Defendant. :

JOINT REQUEST FOR SPECIAL VOIR DIRE

NOW COMES the United States of America and Defendant Ernest Wilson, by and through their respective undersigned attorneys, and hereby jointly request that the Court submit the following questions to the jury panel in the above- captioned case:

1. Do you know (witness list to be supplied)?
2. This case involves charges of theft of mail and interstate transportation of stolen property between December 2004 and July 2005. The defendant is accused of stealing Liberty and Indian-head gold coins from the mail while he was employed as a postal employee. He is further accused of transporting stolen gold coins across state lines from Delaware to Pennsylvania. Is there anything about the nature of the charges that would prevent you from being an impartial juror?
3. Have you, a close friend or relative been investigated by the United States Postal Inspection Service, the Pennsylvania State Police, or other law enforcement agency?
4. Would the fact that the United States Postal Inspection Service and the Pennsylvania State Police investigated this case interfere with your ability to be fair and impartial?
5. Have you served on a jury for a criminal case before?
6. Have you, a close friend or relative ever been arrested for anything other than a minor traffic offense?

7. Have you ever testified in a criminal case?
8. Do you have any pending claims against the United States?
9. Have you ever professionally or as a hobby engaged in the sale of coins, stamps or antiques of any value?
10. Have you ever been a victim of fraud or theft of any items or property that were to be mailed to you by the United States Postal Service?
11. Have you ever been a victim of fraud or theft of any items or property that were to be mailed to you by any business engaged in the service of delivering documents, envelopes or packages, such as Federal Express, etc.?
12. Have you or any member of your immediate family ever been employed by the United States Postal Service, United States Postal Inspection Service, Pennsylvania State Police or any federal or state law enforcement agencies?

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

BY: /s/ David L. Hall

David L. Hall
Assistant United States Attorney
1007 Orange Street, Suite 700
Wilmington, Delaware 19899

/s/ David L. Hall for
MICHAEL J. MALLOY, ESQUIRE
Identification No.: 24446
10 Veterans Square
Media, PA 19063

Dated: 28 June 2006

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA

v.

ERNEST WILSON

)
)
)
)
)

Criminal Action No. 05-105-JJF

CERTIFICATE OF SERVICE

I, Jennifer Brown, an employee in the Office of the United States Attorney, hereby certify under penalty of perjury that on June 28, 2006, I electronically filed:

JOINT REQUEST FOR SPECIAL VOIR DIRE

by causing two (2) copies of said document to be delivered via US Mail to counsel of record at the following address:

Michael J. Malloy, Esquire
10 Veterans Square
Media, Pa. 19063

/s/Jennifer Brown
Jennifer Brown